DOCUMENT RESUME

ED 348 811 EC 301 432

AUTHOR Harbin, Gloria L.; And Others
TITLE Status of States' Progress in Implementing Part H of IDEA: Report #4.
INSTITUTION North Carolina Univ., Chapel Hill. Carolina Policy Studies Program.
SPONS AGENCY Special Education Programs (ED/OSERS), Washington, DC.
PUB DATE Jul 92
CONTRACT G0087C3065
NOTE 53p.; For Reports #'s 1-3, see ED 319 169, ED 328 030, and ED 337 988.
PUB TYPE Reports - Evaluative/Feasibility (142) -- Statistical Data (110)

EDRS PRICE MF01/PC03 Plus Postage.
DESCRIPTORS Agency Cooperation; *Compliance (Legal); *Disabilities; Educational Finance; *Educational Legislation; *Educational Policy; Federal Legislation; *Policy Formation; Preschool Education; *Program Implementation; Standards; State Programs
IDENTIFIERS Individuals with Disabilities Education Act Part H

ABSTRACT

This final progress report examines implementation of Part H of the Individuals with Disabilities Education Act (IDEA) by the various states. Part H coordinators in the 50 states and the District of Columbia and chairpersons of the State Interagency Coordinating Councils were asked to complete the five point Likert "State Progress Scale" for the three stages of policy development, policy approval, and policy application. In the policy development area, accumulated ratings of the 42 responding states indicated that the states had largely finished their development work on the 14 key components of the law with the area of finance reported as the most difficult to complete. The area of personnel standards showed good progress except for day care. In the areas of policy approval and policy application, progress is continuing with finance policies again lagging behind followed by overall administration policies suggesting that these are the most troublesome policy problems to overcome. It is also noted that 10 states have applied for an extended planning period. Extensive charts, graphs, and tables provide supporting detail to the report's narrative. (Contains 10 references.) (DB)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

U.S. DEPARTMENT OF EDUCATION
Office of Educational Research and Improvement
EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)
☑ This document has been reproduced as received from the person or organization originating it.
☐ Minor changes have been made to improve reproduction quality.
• Points of view or opinions stated in this document do not necessarily represent official OERI position or policy.

ED348811

Carolina Institute for Child and Family Policy

STATUS OF STATES' PROGRESS IN IMPLEMENTING PART H OF IDEA: REPORT #4

GLORIA L. HARBIN
JAMES GALLAGHER
LEANDRO BATISTA

The University of North Carolina at Chapel Hill

EC 301432

BEST COPY AVAILABLE

Carolina Policy Studies Program
University of North Carolina at Chapel Hill
NationsBank Plaza, Suite 300
137 East Franklin Street
Chapel Hill
919/962-7374

STATUS OF STATES' PROGRESS IN IMPLEMENTING PART H OF IDEA: REPORT #4

GLORIA L. HARBIN
JAMES GALLAGHER
LEANDRO BATISTA

July, 1992

The Carolina Policy Studies Program is funded by the Office of Special Education Programs, U.S. Department of Education, Cooperative Agreement #G0087C3065. However, these contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

Please feel free to copy and distribute all or parts of this report as you think appropriate.

EXECUTIVE SUMMARY

This is the fourth and final progress report made on the implementation of Part H of the Individuals with Disabilities Education Act (IDEA) by the Carolina Policy Studies Program (CPSP). The Part H Coordinators in each of the 50 states and the District of Columbia were asked to complete the State Progress Scale (SPS), which had previously been administered three times annually since 1989.

This five point Likert scale allowed the Coordinators to report progress in the three stages of policy development, policy approval, and policy application. In addition, in this administration the scale was also given to the Chairperson of the Interagency Coordinating Council (ICC) in each state, and a comparison was made with the ratings of the Part H Coordinator in those 28 states where both ratings were completed. In this case, the ratings showed very close agreement between the collective ratings of the Coordinators and the ICC Chairpersons across all three domains.

At this administration of the SPS, a total of 42 states responded (79%), and 38 of those had data for all four administrations of the scale, allowing for a longitudinal portrait to be drawn on progress across the three years that had elapsed since the first administration.

In the policy development area, the accumulated ratings indicated that the states had largely finished their work on the 14 key components of the law. As was true in the earlier administrations, the area of finance proved to be the most difficult to complete. The dimensions of timely reimbursement and financial responsibility lagged behind the other areas, as well. Policies related to the overall administration of the Part H program also were behind the other areas. The individual area of personnel standards showed good progress in all areas, except day care.

It is worth noting that day care was not one of the 10 areas of professional development noted in the law, but would seem to be a key element in many of the programs that conceptualize day care settings as one of the "least restrictive environment" placements. Special training of day care personnel to allow them to become comfortable with the special needs of many of the children with disabilities would seem to be extremely important to the successful outcomes for their families. A special effort will obviously be called for regarding desirable day care standards to enhance the development of children participating in early intervention.

In the area of policy approval, there has been good progress made since the last administration although some of the states clearly have more work to do before receiving official sanctioning from their state authorities. Again, it is the finance policies that lag behind, suggesting that these are the most troublesome policy problems to overcome. The same pattern is repeated in the policy application stage, with finance and overall administration being the slowest in their rate of progress.

In the reauthorization of Part H of IDEA, there was a provision that allowed some states to apply for an extended planning period of two more years before meeting the requirements for the fourth year of participation. Ten states had taken advantage of that provision by the time the current data had been collected. Seven of these 10 states had data for all four years, which allowed the charting of the progress for all four years for these seven states that applied for an extension. Data were also available for the four year period for the 31 states that did not apply for extended participation.

While the first two years showed little difference between the extended planning states and the others that held to the original path, the third year administration of the SPS showed a dramatic gap developing between the two

groups of states. This was particularly true with regard to policy approval and policy application.

The seven extended planning states were well advised to apply for the extension since, according to our data, they are a long way from being able to implement this law. It would seem to be a prudent move on the part of the Office of Special Education Programs (OSEP) to pay some particular attention to these states through additional inquiry as to the possible barriers that they face, and perhaps with some additional technical assistance of a directed nature to try and help them towards desired progress.

The overall progress of the states towards full implementation continues to be impressive. This "good faith" effort has been made by many of the states in the face of severe economic problems, in addition to the other difficult problems posed by the law itself. The final test for the states, the actual full scale implementation of the service system, still lies ahead for practically all of the states.

Their commitment, so far, gives confidence that they will be able to finish this long and complex journey started over four years ago.

INTRODUCTION

The process of implementing a law is one of the most involved of governmental actions. It becomes even more so when the law has the complexities of Part H of the Individuals with Disabilities Education Act (IDEA). This law not only provides for a comprehensive, multidisciplinary, interagency coordinated service system for infants and toddlers with disabilities and their families, it also proposes a long series of reforms in the delivery system of services itself, changing the relationship of client and professional and modifying the practice of many professionals (Harbin & McNulty, 1990).

The Carolina Policy Studies Program (CPSP) has been following the implementation of this law for four years, and this report is the fourth in a series designed to measure progress in implementation over the required 14 components of the law itself.

Previous studies have indicated that states have made substantial progress in developing policies across all of the 14 components (Harbin, Gallagher, & Lillie, 1989; Harbin, Gallagher, Lillie, & Eckland, 1990; Harbin, Gallagher, & Lillie, 1991). The time and expertise committed by thousands of individuals across the country to the development of early intervention services has been impressive. As a result of this commitment from parents, service providers, university faculty, physicians, state agency staff, and policy makers, states have, in large measure, shown a "good faith" effort to comply with the complex set of requirements that are part of this legislation.

According to the original legislation, states that participated in this discretionary program since its inception should have already reached their fourth year of eligibility and participation. In order to obtain the fourth year of funding, states are required to have "...adopted a policy which incorporates all of

the components of a statewide system" (Part H of IDEA, Sec. 1475 (b)(1)(A)). In addition, the "statewide system will be in effect no later than the beginning of the fourth year of the state's participation" (Part H of IDEA, Sec. 1475 (b)(1)(C)). States are also required to provide multidisciplinary assessments, develop an Individual Family Service Plan (IFSP), and make available service coordination to all eligible infants and toddlers and their families. The actual provision of the services included in the IFSP to all eligible children is not required until the beginning of the fifth year of participation.

Despite the widespread 'good faith' effort, a combination of declining state economics, and the multitude of tasks to be accomplished made it clear that many states would not meet the fourth or fifth year timeline in the legislation. In recognition of these complexities, Congress has allowed states an option to extend their planning and development phase of this law for another two years. Ten states have taken advantage of that provision at Year 4 and remained in third year extended participation. However it is expected that most of the states would have moved a considerable distance towards full implementation through the three stages of the implementation process: policy development, the establishment of rules and standards; policy approval, the official sanctioning of these policies; and policy application, the putting into actual effect the rules and standards in the form of comprehensive, multidisciplinary, interagency services.

One of the potentially limiting factors to the previous reports on states' progress in implementing Part H of IDEA has been that the findings have been based upon a single informant, the Part H Coordinator for each of the states. There has always been an issue as to whether the perceptions of that particular individual matched with reality. This was a special problem since there are few individuals in the state with the knowledge of the level of progress towards policy

implementation in all of the required 14 components, other than the Coordinator who is expected to know about the full scope of the program.

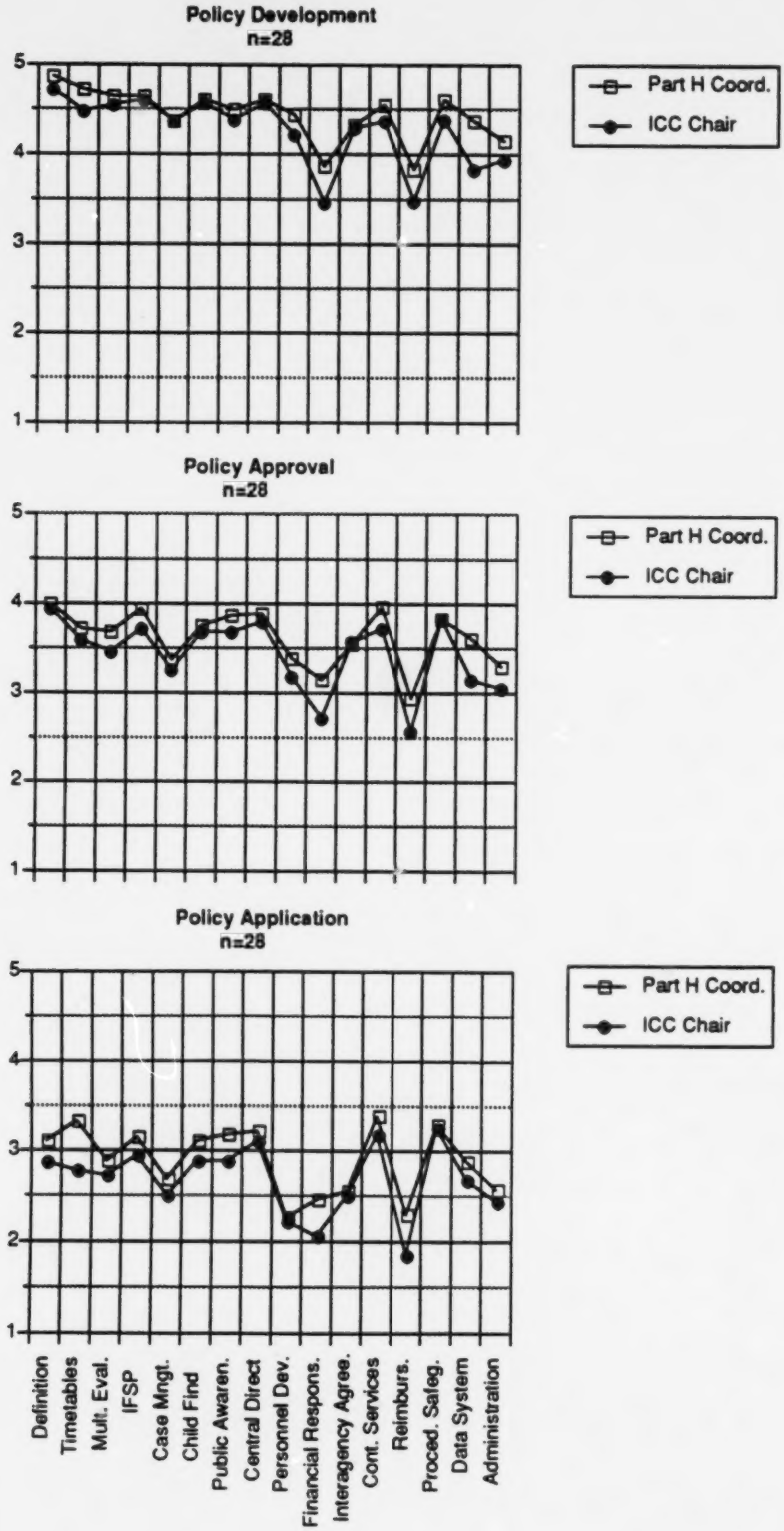
Despite the observations of CPSP staff, who had personal knowledge of many individual states and who believed that, in general, the ratings matched well with their personal observations, there remained a question about the accuracy of the perceptions being used to measure progress. For this administration of the State Progress Scale (SPS), therefore, we asked the chairperson of the state Interagency Coordinating Council (ICC), who, by this time in most states, had had a chance to develop comprehensive knowledge of the state's progress, to also independently complete the SPS.

Figure 1 shows the results of the composite scores from the states where both the Part H Coordinator and the ICC Chair provided ratings. As can be seen, there is a strong concordance between the views of the Part H Coordinator and the ICC Chair on all three stages of policy development, approval, and application. This is seen as additional support for the overall portrait of progress that is being presented in this report.

METHOD

In order to obtain continued information about the progress of the states, the CPSP has asked Part H Coordinators from the 51 jurisdictions (50 states and the District of Columbia) to complete the State Progress Scale (SPS) that was especially designed to measure state progress (Gallagher & Harbin, 1988). For this fourth administration, 42 of the 51 jurisdictions completed the scale for a return rate of 79%. However for those analyses in the current study which seek to describe the states' progress over the four years, only 38 states will be utilized since these states have completed the scale all four years in which the study has taken place.

Figure 1. Comparison of Part H Coordinators and ICC Chairs Ratings:
State Progress Scale



Purpose. This study, conducted by the CPSP, focuses on the fourth administration of the State Progress Scale (SPS). At this critical juncture in the implementation of Part H of IDEA, this study has two fundamental purposes:

(1) to determine the status of the states' progress in the implementation of this law as many were preparing to enter or have already entered the fourth year of participation in this program, and

(2) to examine the amount of progress states have made in the last year. Of particular interest was whether the amount of progress was consistent with the previous year's progress.

The SPS utilizes a five point Likert-type scale with one (1) representing "Not Developed" and five (5) representing "Totally Developed." The scale is composed of items for each of the 14 required components of the law. The Part H Coordinators were asked to rate the progress of their state on each of the stages of policy implementation (development, approval, and application). Several other studies of policy implementation have identified similar stages (Campbell & Mazzoni, 1976; Meisels, 1985). In this administration, we also asked the chairpersons of the Interagency Coordinating Council to complete the scale. Twenty-eight chairpersons responded as shown in Figure 1.

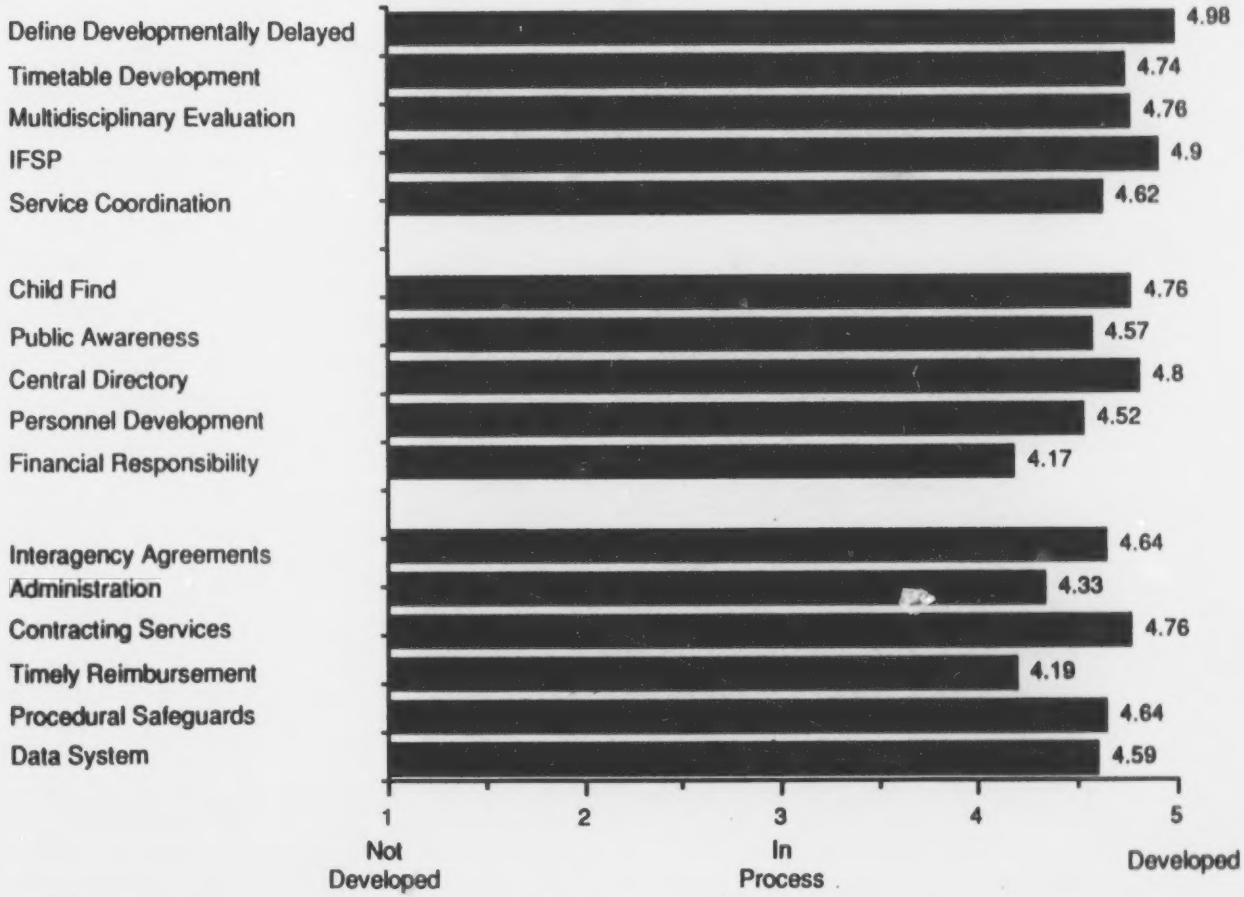
RESULTS

Status of States' Progress

Findings from the fourth administration of the SPS are presented for each of the policy stages: policy development, policy approval, and policy application.

Policy Development. Figure 2 presents the mean ratings for state progress in policy development for 13 of the required components for the 42 reporting states. The personnel standards component is presented separately.

Figure 2: Means for State Progress in the Implementation of Part H of IDEA
POLICY DEVELOPMENT, 1992, N=42



Practically all of the 42 states have produced a definition of who is a developmentally delayed child. In many of the other areas such as procedures for IFSP, the development of a child find system and a central directory, and rules for contracting services, the states report that their planning is virtually complete.

What is worth noting are the areas in which there is still substantial progress to be made before final policy development has been completed. These represent the areas of financial responsibility, timely reimbursement, and administration and monitoring of the system. From the beginning of the policy implementation process and consistently through three former ratings, the area of financial responsibility represented one of the most difficult areas of policy development to achieve. This fourth year rating does nothing to change that portrait. Clifford (1991) in a separate CPSP report discussed the special problems of financial planning.

The mean score of slightly over four on a five point scale with regard to financial responsibility really represents that there are 14 states that are merely in the process of developing policies for assigning financial responsibility (see Table 1). In terms of timely reimbursement, 5 states are not willing to even say that, and a total of 16 states fall short of having fully developed policies at this time. Overall, this means that there are a very substantial number of states that have yet to cope successfully with the issues of assigning financial responsibility and timely reimbursement.

Figure 3 presents data reported by states related to the development of personnel standards, certification, and licensure for the professional disciplines listed in Part H of IDEA. Because several states indicated a strong interest in the integration of infants and toddlers with disabilities into regular child care settings, day care was added to the list of disciplines, although day care personnel are not listed in the law or the accompanying regulations.

Figure 3: State Progress in Establishing Professional Standards
POLICY DEVELOPMENT, 1992, N = 42

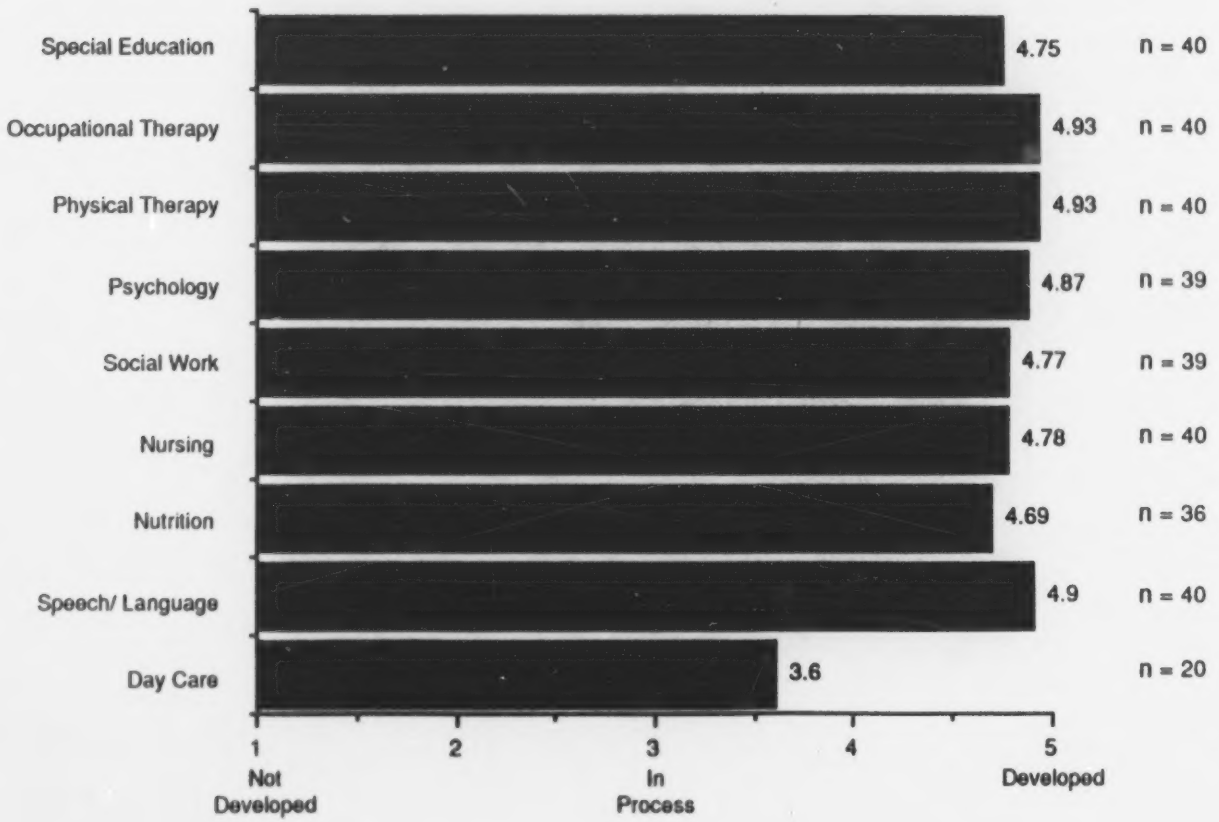


Table 1

State Progress in the Implementation of Part H of IDEA:

Policy Development

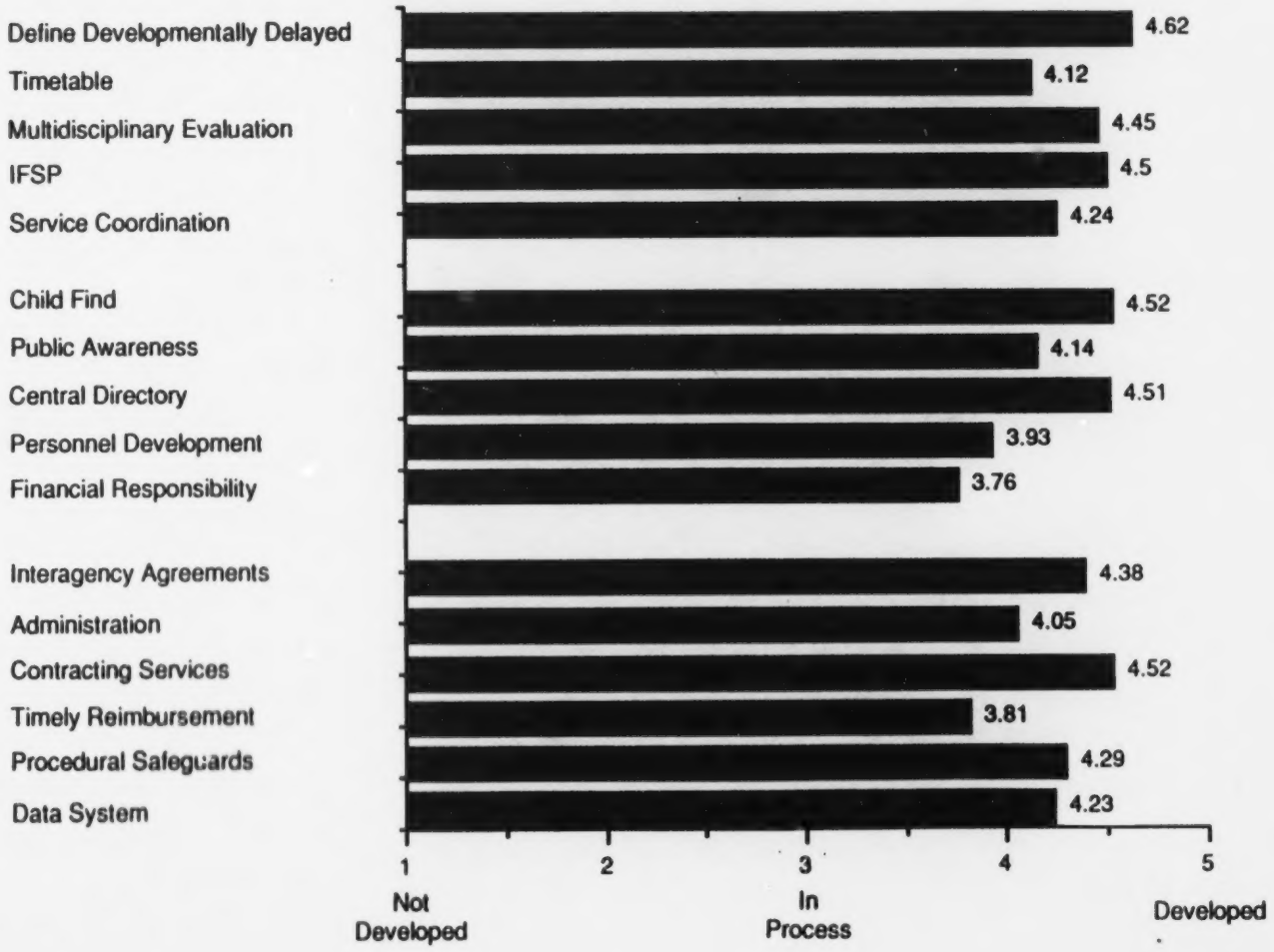
		Not Developed		In Progress		Developed
Requirements	N	1	2	3	4	5
DEFINITION	42	0	0	0	1	41
TIMETABLES	42	0	0	1	9	32
MULTIDISCIPLINARY EVALUATION	42	0	0	2	6	34
INDIVIDUAL FAMILY SERVICE PLAN	42	0	0	0	4	38
SERVICE COORDINATION	42	0	1	3	7	31
CHILD FIND	42	0	0	2	6	34
PUBLIC AWARENESS	42	0	1	4	7	30
CENTRAL DIRECTORY	41	0	0	3	2	36
PERSONNEL DEVELOPMENT	42	0	1	7	3	31
ASSIGNING FINANCIAL RESPONSIBILITY	42	0	1	14	4	23
INTERAGENCY AGREEMENTS & DISPUTE RESOLUTION	42	0	1	5	2	34
CONTRACTING OF SERVICES	42	0	1	2	3	36
TIMELY REIMBURSEMENT	42	2	3	6	5	26
PROCEDURAL SAFEGUARDS	42	0	1	4	4	33
DATA SYSTEM	39	0	0	5	6	28
ADMINISTRATION	42	1	2	8	2	29
PERSONNEL STANDARDS						
SPECIAL EDUCATION	40	0	0	4	2	34
OCCUPATIONAL THERAPY	40	0	0	1	1	38
PHYSICAL THERAPY	40	0	0	1	1	38
PSYCHOLOGY	39	0	0	2	1	36
SOCIAL WORK	39	1	0	2	1	35
NURSING	40	1	0	2	1	36
NUTRITION	36	1	0	2	3	30
SPEECH-LANG PATHOLOGY	40	0	0	1	2	37
DAY CARE WORKERS	20	4	0	6	0	10

Figure 3 indicates that states, as a group, have nearly completed the development of personnel standards for all required disciplines. From Table 2, it appears six states have not even considered personnel standards for day care workers. The absence of the discipline of day care from the list of required professions included in the law has undoubtedly contributed to the slow progress in this area.

Policy Approval. Figure 4 indicates the average scores from the 42 reporting states on the status of policy approval. In this stage, the Part H Coordinators are reporting on whether or not there has been an official approval by the state of the policies that have been developed. In this instance, there are three of the 15 required components that received a mean rating of less than 4.0. It is no surprise to find that timely reimbursement and financial responsibility are two of these three areas. Many of the states are approaching a full completion of policy approval for components such as the definition, child find systems, central directory, contracting services. It is clear that the states that are reporting here have reached a point where they, as a group, have almost completed their progress in policy approval, with the significant exception of the financial responsibility item.

Figure 5 indicates the level of policy approval for the various professional groups in the establishment of professional standards. As was indicated in the policy development area, day care represents the least well developed area of professional standards. In addition, nutrition and special education also seem to fall somewhat short of full policy approval, whereas the other areas of speech/language pathology, occupational therapy, physical therapy, psychology, nursing, and social work seem to be well on their way to full establishment of professional standards for these professional areas.

Figure 4: Means for State Progress in the Implementation of Part H of IDEA
POLICY APPROVAL, 1992, N=42



11

Figure 5: State Progress in Establishing Professional Standards
POLICY APPROVAL, 1992, N = 42

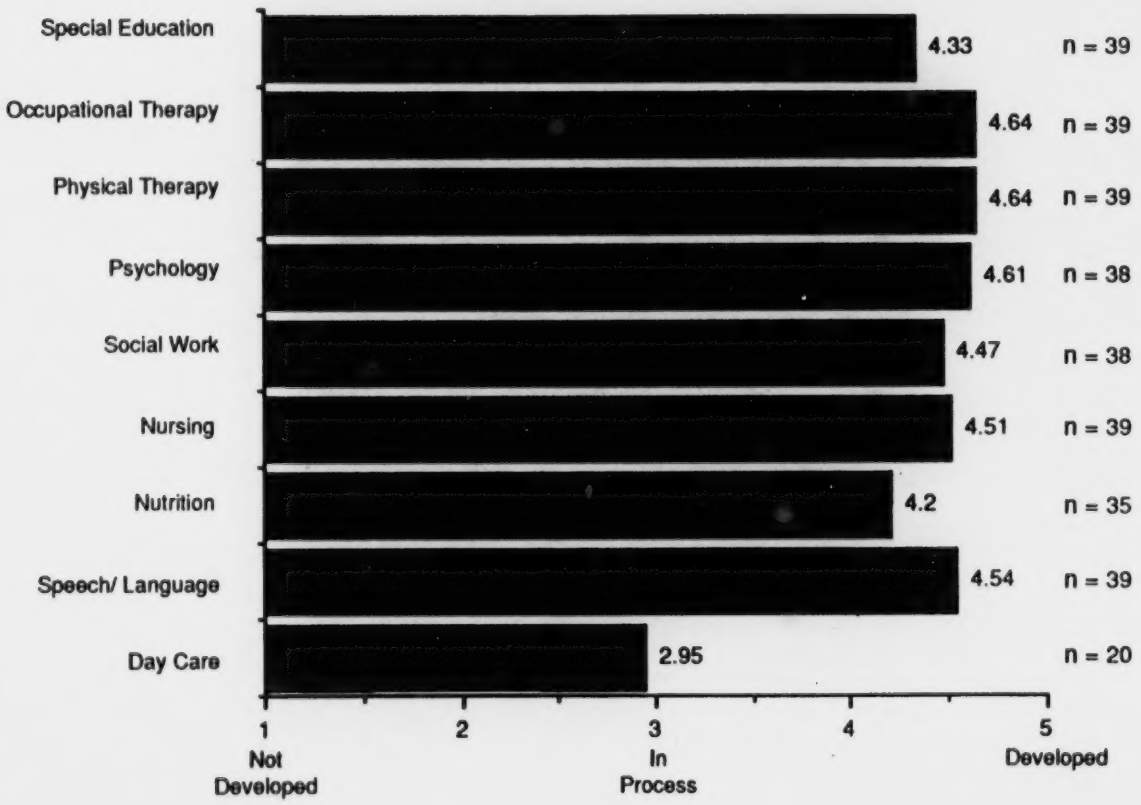


Table 2

State Progress in the Implementation of Part H of IDEA: Policy Approval

		Not Developed		In Progress		Developed
Requirements	N	1	2	3	4	5
DEFINITION	42	0	1	4	5	32
TIMETABLES	42	0	3	11	6	22
MULTIDISCIPLINARY EVALUATION	42	0	1	7	6	28
INDIVIDUAL FAMILY SERVICE PLAN	42	0	1	6	6	29
SERVICE COORDINATION	42	1	1	11	3	26
CHILD FIND	42	0	0	6	8	28
PUBLIC AWARENESS	42	1	3	9	5	24
CENTRAL DIRECTORY	41	1	0	6	4	30
PERSONNEL DEVELOPMENT	42	0	4	13	7	18
ASSIGNING FINANCIAL RESPONSIBILITY	42	1	7	12	3	19
INTERAGENCY AGREEMENTS & DISPUTE RESOLUTION	42	0	2	9	2	29
CONTRACTING OF SERVICES	42	1	0	7	2	32
TIMELY REIMBURSEMENT	42	5	4	6	6	21
PROCEDURAL SAFEGUARDS	42	1	1	10	3	27
DATA SYSTEM	39	0	3	7	7	22
ADMINISTRATION	42	2	1	13	3	23
PERSONNEL STANDARDS						
SPECIAL EDUCATION	39	0	3	6	5	25
OCCUPATIONAL THERAPY	39	0	1	4	3	31
PHYSICAL THERAPY	39	0	1	4	3	31
PSYCHOLOGY	38	0	1	5	2	30
SOCIAL WORK	38	1	1	5	3	28
NURSING	39	1	1	5	2	30
NUTRITION	35	2	2	6	2	23
SPEECH-LANG PATHOLOGY	39	0	1	5	5	28
DAY CARE WORKERS	20	6	4	1	3	6

Policy Application. Figure 6 indicates the states' progress in the implementation of Part H of IDEA for the final stage of policy application. Here the Part H Coordinators in the states are reporting on the degree to which policies are operational. These might be expected to fall shorter of final completion than would the reports on policy development and policy approval. Only two of the 16 items reached a mean rating of over 4.0 on a five point scale. As Figure 6 indicates, the areas showing the least progress towards policy application are again the areas of financial responsibility and timely reimbursement. These items barely exceed a rating of "in progress." As indicated in Table 3, there are 11 states that have not yet begun to use their policies related to timely reimbursement. Policies related to overall administration of the Part H system, personnel development, time table implementation, and data system also lag behind the rest of the components in policy application. These results remind us of how difficult it is to bring the multi-dimensional factors that are engaged in this policy implementation into coordination and full operation.

Finally in Figure 7, we display the operational level of policies related to professional standards. As noted in the previous figures on policy development and policy approval, the area of day care is the least well developed of all of the professional areas in terms of professional standards. However, in this final policy stage, many of the other professional standards for special education, psychology, social work, nursing, and nutrition received a mean rating of less than 4.0. This indicates that there is still major effort needed before the professional standards that have been developed and approved are actually put into place.

Figure 6: Means for State Progress in the Implementation of Part H of IDEA
POLICY APPLICATION, 1992, N=42

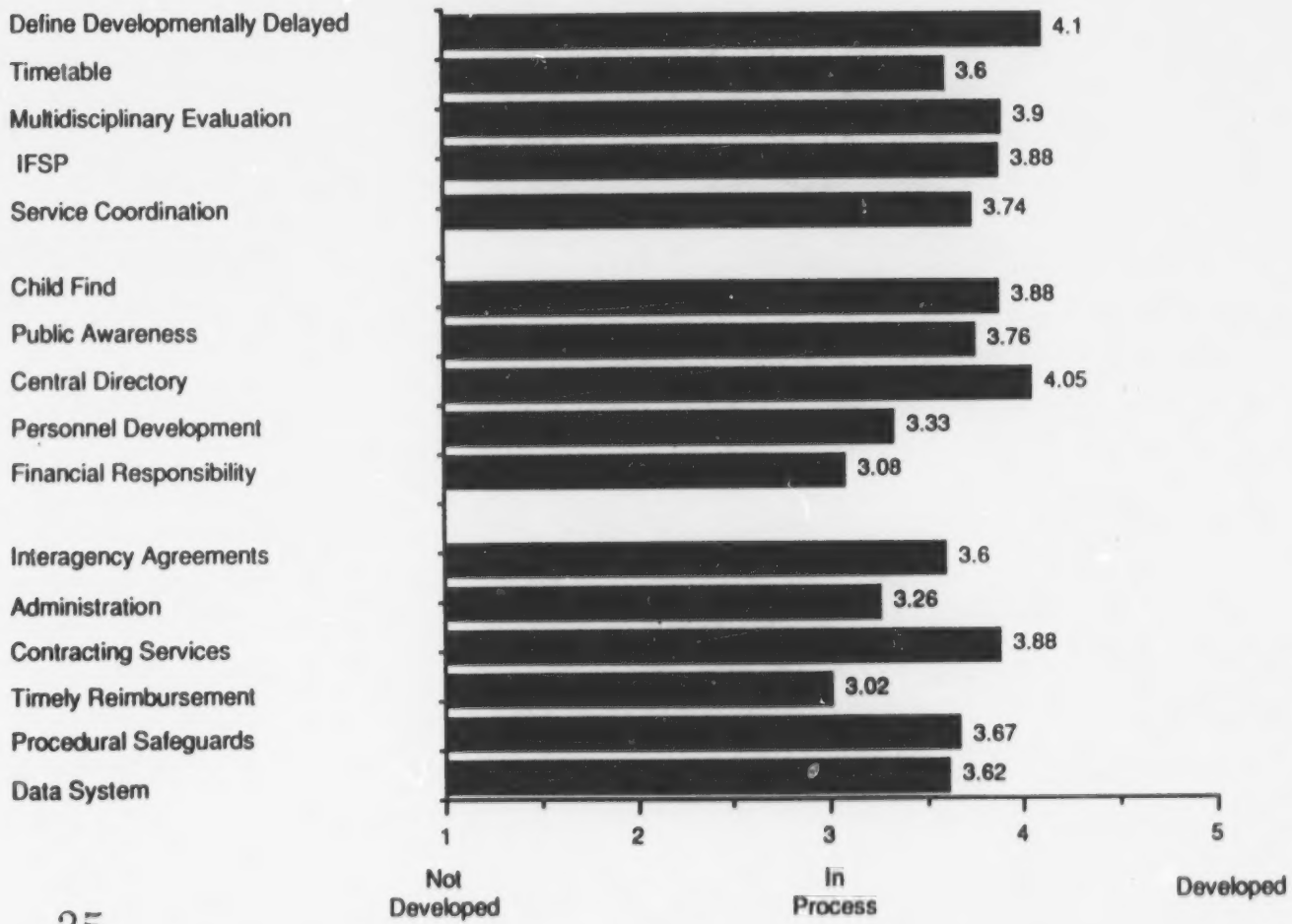


Figure 7: State Progress in Establishing Professional Standards
POLICY APPLICATION, 1992, N = 42

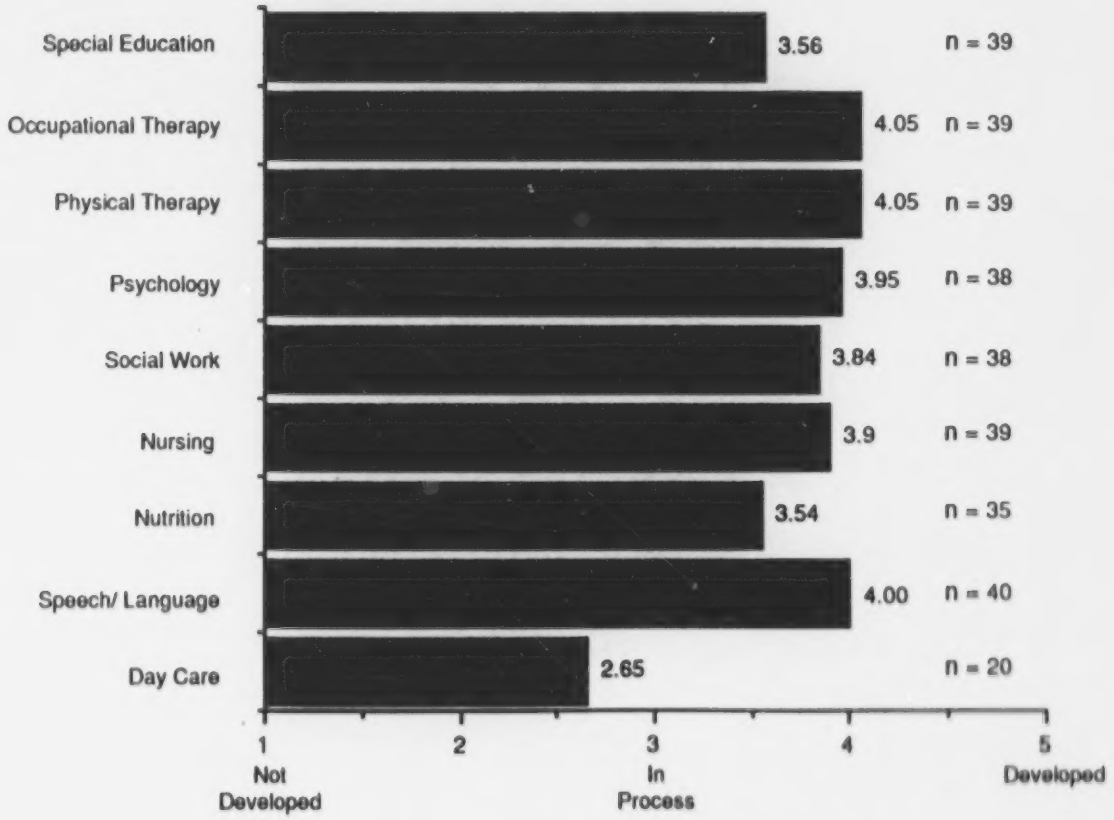


Table 3

State Progress in the Implementation of Part H of IDEA: Policy Application

Requirements	N	Not Developed 1	2	In Progress 3	4	Developed 5
DEFINITION	42	3	3	5	7	24
TIMETABLES	42	3	2	16	9	12
MULTIDISCIPLINARY EVALUATION	42	2	3	9	11	17
INDIVIDUAL FAMILY SERVICE PLAN	42	1	2	12	13	14
SERVICE COORDINATION	42	1	4	13	11	13
CHILD FIND	42	1	3	10	14	14
PUBLIC AWARENESS	42	4	3	6	15	14
CENTRAL DIRECTORY	41	2	1	8	12	18
PERSONNEL DEVELOPMENT	42	5	8	16	6	7
ASSIGNING FINANCIAL RESPONSIBILITY	42	5	8	16	6	7
INTERAGENCY AGREEMENTS & DISPUTE RESOLUTION	42	2	7	11	8	14
CONTRACTING OF SERVICES	42	3	5	9	11	17
TIMELY REIMBURSEMENT	42	11	3	12	6	10
PROCEDURAL SAFEGUARDS	42	4	2	12	10	14
DATA SYSTEM	39	1	5	12	11	10
ADMINISTRATION	42	5	8	10	9	10
PERSONNEL STANDARDS						
SPECIAL EDUCATION	39	7	2	9	4	17
OCCUPATIONAL THERAPY	39	5	1	5	4	24
PHYSICAL THERAPY	39	5	1	5	4	24
PSYCHOLOGY	38	5	1	7	3	22
SOCIAL WORK	38	6	1	6	5	20
NURSING	39	6	1	6	4	22
NUTRITION	35	7	1	8	4	15
SPEECH-LANG PATHOLOGY	40	5	1	6	5	23
DAY CARE WORKERS	20	7	2	6	1	4

Relative Gains Across Four Years

Figure 8 reflects the gains made by 38 of the states in policy development in each of the four years with approximately one year between measurements. As would be expected, the major gains that have been noted were made during the first and the second years. As states reached the point of "fully developed," it is not surprising to find a smaller gain, because in one sense there is less distance to the goal of full development.

Over the past year, the components for which the most gains have been reported are the areas of timely reimbursement, financial responsibility, and interagency agreements. Although policies in these areas are the furtherest from being fully developed, the Part H Coordinators are reporting substantial gains towards full development for each of these areas. Similar modest gains towards full policy development were seen for the standards of the various professional disciplines, again with the exception of day care (see Figure 9). Aside from day care, all of the other professional disciplines seem to have reached a level of almost full policy development. This is particularly encouraging since the development of professional standards is hardly a simple task, or one easily arrived at.

Figure 10 indicates that the area of strongest growth in policy implementation represents the states' achievement in the area of policy approval in practically all of the items reported upon. In this regard, the gains that were made this year (1991-1992), almost match those of the year before. While the gains in this last year were quite modest with regard to policy development, it is clear through the findings reported in Figure 10, that very substantial activity was taking place in the states in obtaining official sanctions for their policies. This includes substantial progress in the lagging areas of timely reimbursement,

Figure 8: Mean Gains in State Progress in the Implementation of Part H of IDEA
POLICY DEVELOPMENT, 1989-92, N=38

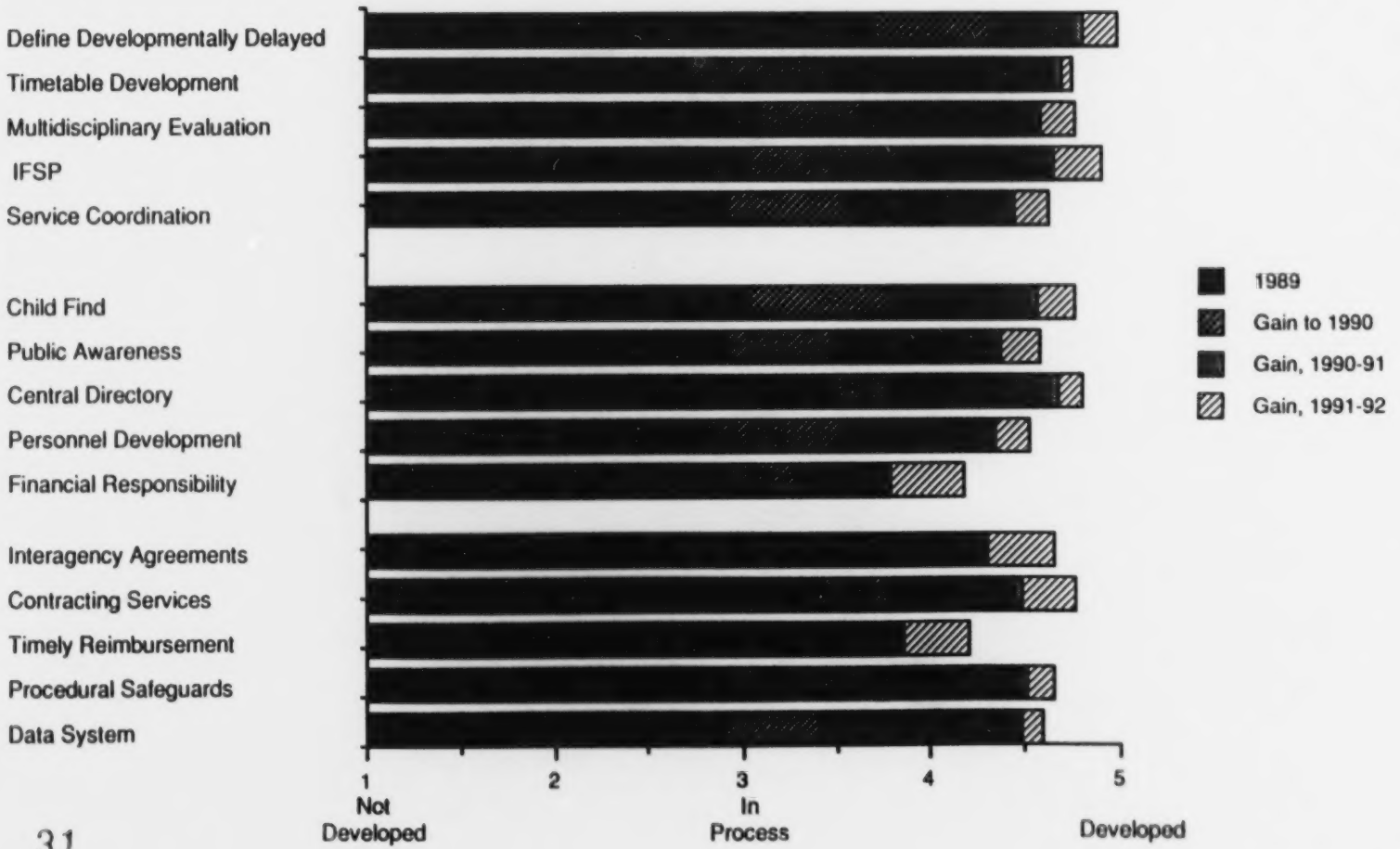
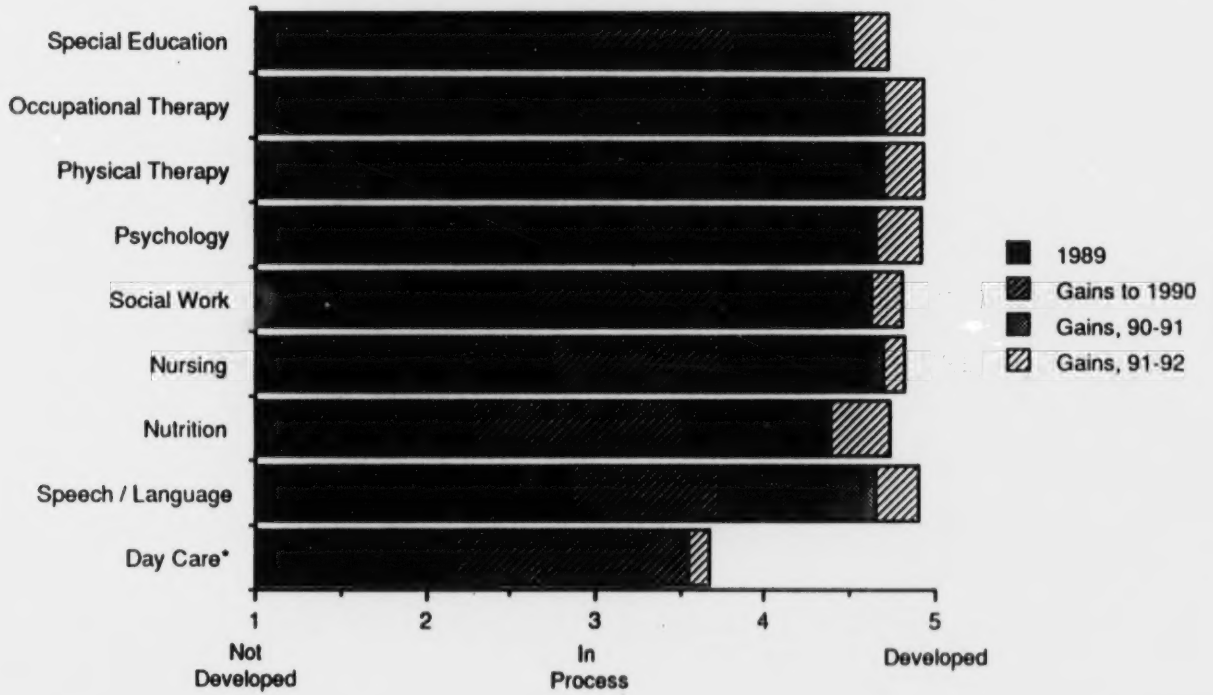


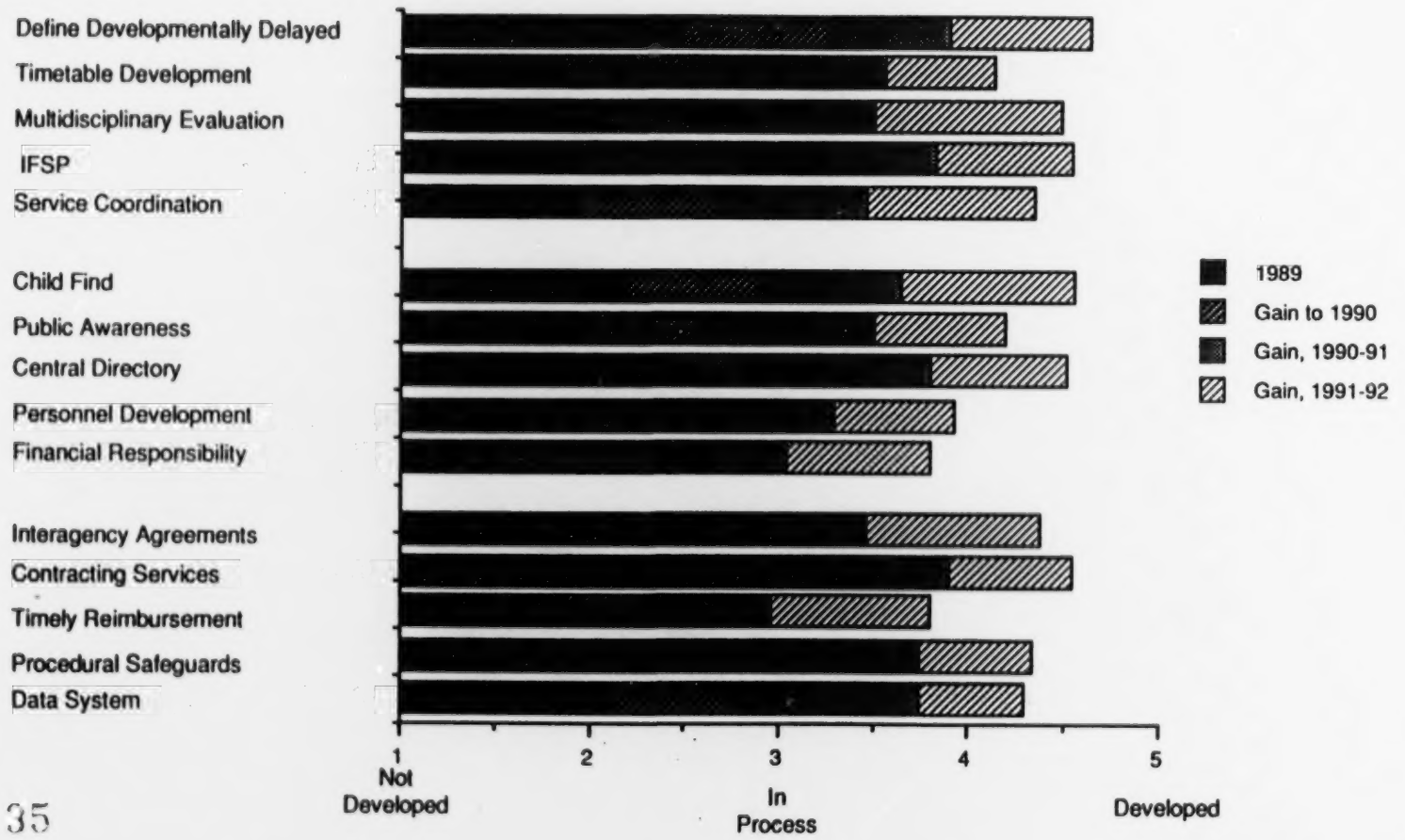
Figure 9: Mean Gains in Professional Standards in the Implementation of Part H of IDEA POLICY DEVELOPMENT, 1989-92, N = 38



Note: Due to missing data, Ns for each item vary.

* Day Care for 90-91 = -0.06 not shown

Figure 10: Mean Gains in State Progress in the Implementation of Part H of IDEA
POLICY APPROVAL, 1989-92, N=38



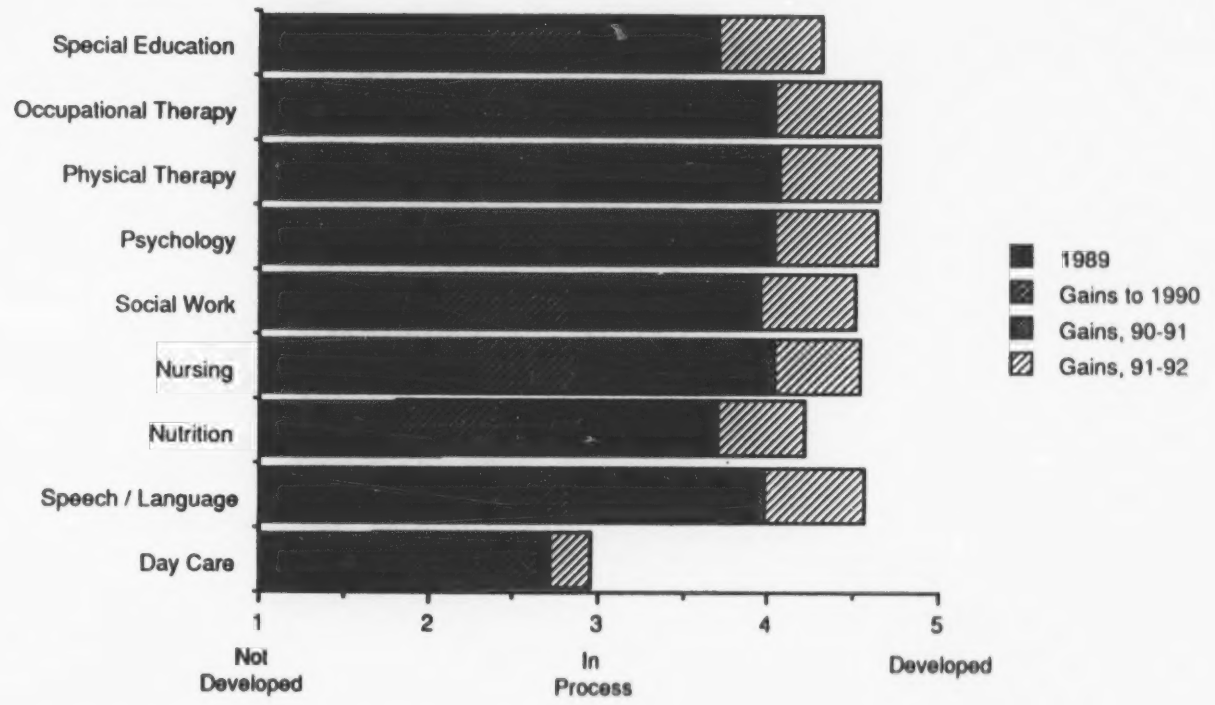
financial responsibility, and personnel development. Although each of these areas still falls behind the other components in terms of overall progress, substantial gains are reported from Year 3 in these areas. It seems obvious that the forces inhibiting the development of some of these areas are still operational. However, substantial progress is being made.

The findings of the gains made in policy approval for professional standards for the various professional disciplines, with the very important exception of day care, show that most of the discipline areas received modest to substantial gains during 1991-1992 (see Figure 11). It is clear that the area of day care represents an area that needs special attention from the states if day care is going to finally match the progress of other professional standards such as special education, occupational therapy, social work, etc.

Also encouraging are the findings reported in Figure 12 on policy application for 13 of the 14 components in the implementation of Part H. In this case, the Part H Coordinators are reporting on progress towards the full operational status of the policies. As one can see from Figure 12, there have been substantial areas of growth exceeding that of Year 3 and Year 2. In terms of actually using the policies for defining developmental delay, multi-disciplinary evaluation, personnel development, and interagency agreements, there is a greater than average gain this year than in the previous two years. This indicates again that states have engaged in major efforts to put those policies to work in the final stage of policy application.

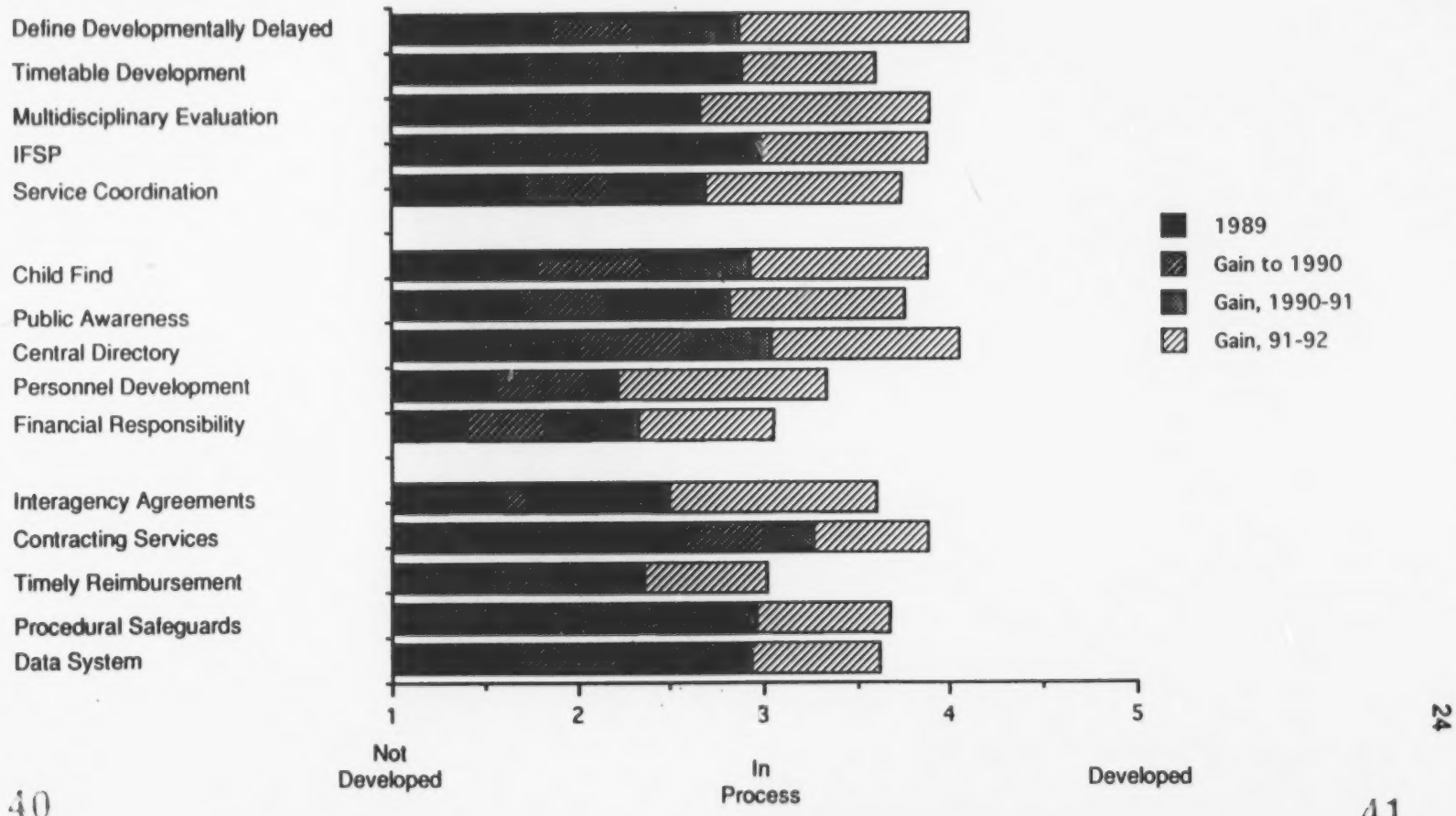
The overall portrait shows an overwhelming number of states that are making substantial progress towards the final goal of full implementation of Part H of IDEA. It is impressive that this has been accomplished during a period

Figure 11: Mean Gains in Professional Standards in the Implementation of Part H of IDEA
POLICY APPROVAL, 1989-92, N = 38



Note: Due to missing data, Ns for each item vary.

Figure 12: Mean Gains in State Progress in the Implementation of Part H of IDEA
POLICY APPLICATION, 1989-92, N=38



in which many of the states are experiencing a sharp economic downturn and difficult financial crises that have caused them to pull back from many of their other cherished goals in state government.

The report on progress in policy application of the professional standards indicates that although gains have been made in this stage, these gains are less than those reported for the other required components presented in Figure 12. Although progress is reported for each professional discipline, a substantial distance still has to be covered for full policy application (see Figure 13). This is especially true with regard to day care standards where the mean rating does not even reach the level of 'in process.'

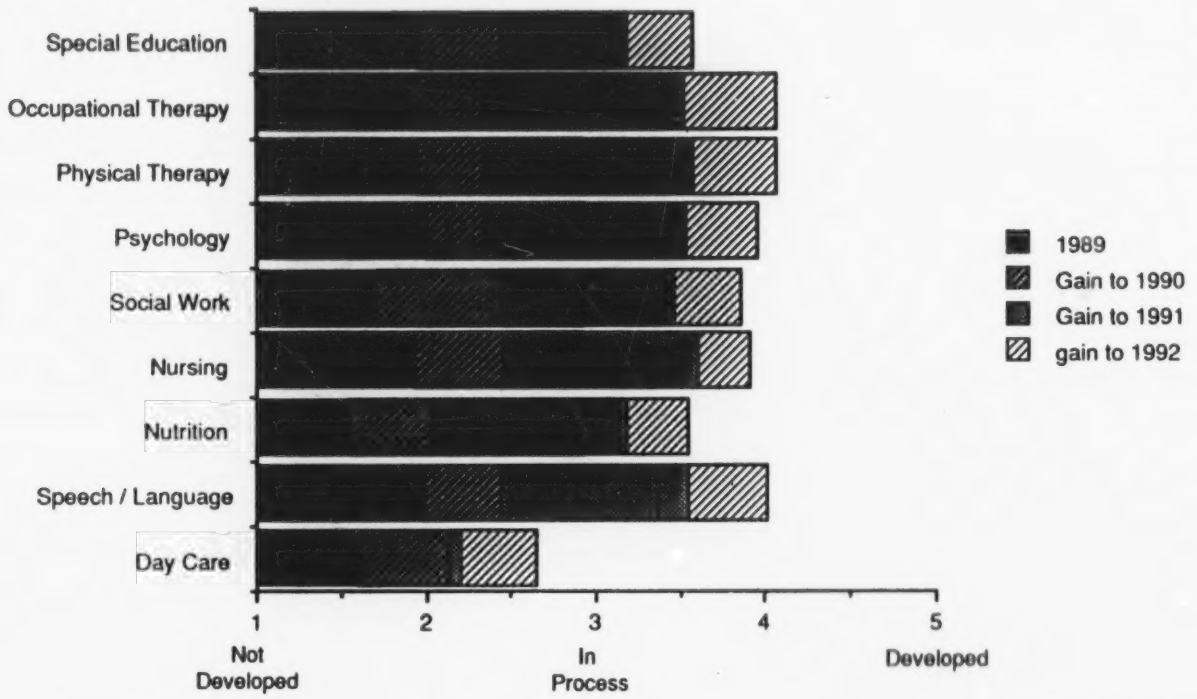
The overall portrait is quite encouraging, representing solid and continued gains in the areas of policy approval and policy application. However, this does not mean that there have not been substantial problems in individual states in making progress towards the final goal. As was pointed out, there have been very difficult financial times for the states during this calendar period. Finding that the states are continuing their quest for full policy implementation is certainly an encouraging sign, representing a commitment from the states, in general, to complete the task that was begun four years ago.

Extended Planning

The reauthorization of Part H of IDEA provided an option for states that thought they were not ready to meet the requirements of the fourth or the fifth year as delineated in the legislation. These states were allowed to apply for an extended planning (EP) period of two more years to meet these requirements.

A total of 10 states applied for this extended period. However, only 7 states (out of these 10) returned the State Progress Scale (SPS) for the four year period of data collection (1989, 1990, 1991, 1992). Of the remaining 41 states

Figure 13: Mean Gains in Professional Standards in the Implementation of Part H of IDEA
POLICY APPLICATION, 1989-92, N = 38



Note: Due to missing data, Ns for each item vary.

(District of Columbia included), only 31 states (76%) have completed SPSs for all four years of data collection. Therefore, a total of 38 states (73%) have been included in this analysis; the analysis of the progress in the implementation of all of these 38 states has been reported earlier. Figure 14 shows the comparison of the 7 states that applied for extended planning compared with the 31 states that were able to meet the requirements for fourth year funding.

States that are now asking for an extended period of participation in the third year of implementation (EP states), reported a lower start in 1989 (the first year of data collection) for all three policy stages (i.e., development, approval, and application), when compared to the remaining states (Non-EP states). However, the second year of data collection (1990) demonstrated that the EP states had made accelerated progress, lessening the gap for policy development and policy approval, whereas progress reported for policy application presented no change (see Figure 14).

Although all states have demonstrated progress in the implementation of IDEA, after the second year, the Non-EP states reported sharp progress leading to an increase in the gap between the two groups for the third and fourth years (note Figure 14). While most Non-EP states (those receiving fourth and fifth year funding), now have fully developed and approved their policies and are also near the completion of their policy application process, EP states are near completion of the policy development stage, but only halfway through the process of policy approval, and are even further behind in the application of their policies.

Figure 15 shows a comparison of the fourth year data for the EP (N = 7) and Non-EP (N = 31) states for each component for the stages of policy development, policy approval, and policy application. By 1992, the gap between the two groups has been reduced in policy development. There are some items (i.e., service coordination, personnel development, and procedural safeguards),

Figure 14: Comparison of States that Applied for Extended Participation (EP) n=7 and Other States (Non-EP) n=31.

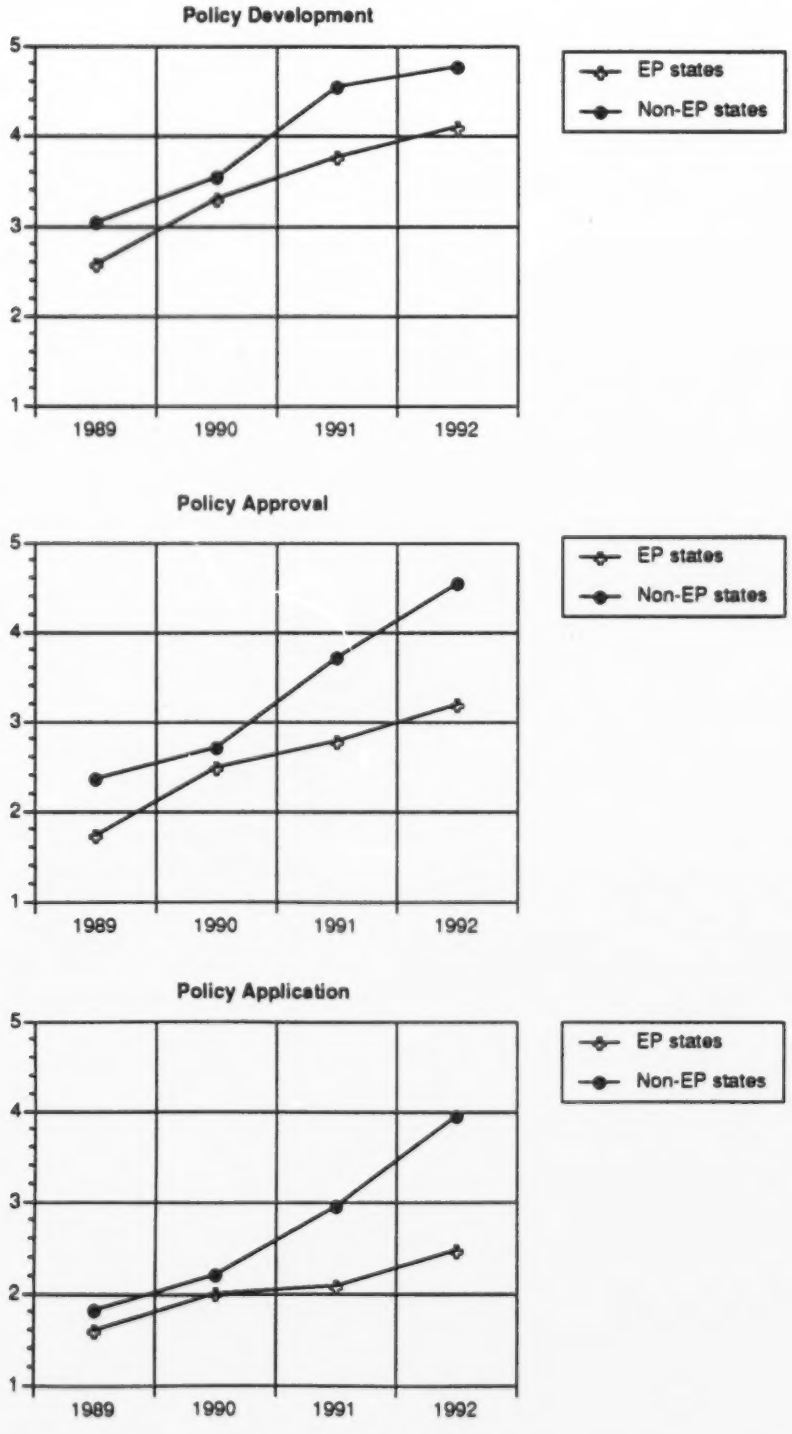
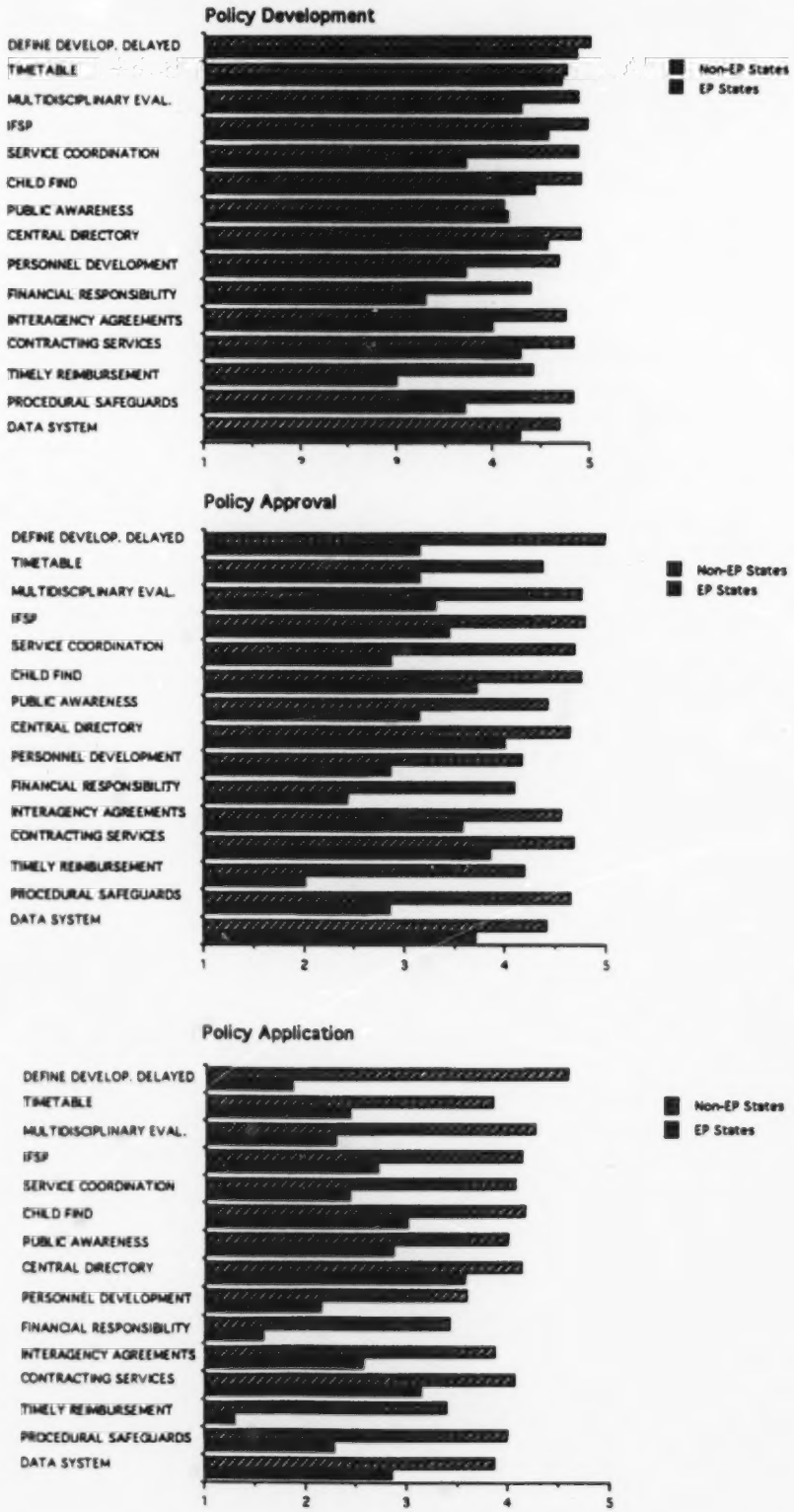


Figure 15: Comparison of States That Applied For Extended Partipation (n=7) and States That Have Not Applied (n=31)



where there remains a large gap between these two groups of states (nearly one point on the five point scale). Whereas defining developmentally delayed, timetable development, and public awareness, presented almost no difference in scores between the EP and Non-EP states.

The stages of policy approval and policy application, however, clearly show that the EP states were well advised to seek an extension because their policies were far from being ready for official approval. In these 7 states, policy approval had not reached the midpoint of the scale (i.e., mean rating of 3.0) towards obtaining approval of policies for procedural safeguards, timely reimbursement, financial responsibility, personnel development and case management. Naturally, their progress towards policy application was even slower.

The EP states have a long ways to go and some form of extra help or technical assistance may be called for if they are to meet their new deadlines. In particular, some direct inquires need to be made to ascertain the reason for the dramatic slowing of their pace in the third year in comparison with the other 31 states. A needs assessment or diagnostic profile needs to be determined to provide the most relevant assistance.

CONCLUSIONS

This fourth administration of the SPS has confirmed, in large measure, results of earlier administrations. There is, first of all, evidence of continued progress towards full implementation by the states. In this case, the progress was noted, in particular, in the stages of policy approval and policy application.

Those components that have been slow in developing in the past continue to be troublesome to the states. This applies particularly to the areas related to developing a finance system. The fundamental assumption of this law is that the

states can, by combining a variety of available sources of funds, support this mandated program of services to infants and toddlers and their families. At the very least, it must be said that this remains an unproven proposition that must wait for the states to move into a full service mode. Some observers, however, have expressed the opinion that this is essentially a dysfunctional financial strategy and that serious thought has to be given to whatever alternatives might be available. (Clifford, Kates, Black, Eckland, & Bernier, 1991).

While many different financial sources have recently been identified as the states gain more experience (Clifford & Bernier, in preparation), there remains the issue as to whether or not this is really an elephant and rabbit stew with the elephant being Medicaid. Some have suggested that any family found eligible under Part H should be automatically eligible for Medicaid without the other income restrictions being considered.

One of the possible reservations about Medicaid representing the fundamental answer to the financial problems, is that a number of governors have expressed serious concerns on what Medicaid is currently doing to their state budgets. Medicaid requires state matching funds and is an entitlement; any eligible person is entitled to receive the services. That means that the state budget is difficult to estimate, because the state cannot tell in advance how many patients will request Medicaid services, and consequently, how much matching money the state will have to appropriate.

Further, because many states by their constitution, must balance their budgets each year, many other programs in the state are held hostage to the Medicaid demands. Prudent administrators want to be cautious about expenditures that would throw the budget out of balance, with the wild card of Medicaid hovering in the background.

The action of the Congress in allowing for states to apply for another two years of planning seems to have been justified by the results presented here. The states that have taken advantage of that provision were quite far from full development and approval of the necessary policies, as these results indicate. Another group of states may wish to delay their entry into year five when comprehensive services to all entitled children are required. This Congressional provision, which recognizes the wide range of individual differences in the level of preparation from one state to another, has allowed many states to continue to participate in this program rather than be forced to drop out because of failure to meet the requirements of the original timeline.

This program has evolved through a period of uncertainty in state budgeting as a result of a clear fiscal downturn across the entire country. In the midst of these problems, the states have shown a "good faith effort" in continuing to press forward to the complicated goal of a comprehensive, multidisciplinary, interagency program. Such commitment bodes well for the next stage of full implementation of services, which many of the states are now beginning to reach.

REFERENCES

Campbell, R. & Mazzoni, T. (1976). State policy making for the public schools. Berkeley, CA: McCutcheon Publishing Corporation.

Clifford, R. (1991). State financing of services under P.L. 99-547, Part H. Chapel Hill, NC: Carolina Policy Studies Program, Frank Porter Graham Child Development Center, University of North Carolina at Chapel Hill.

Clifford, R. & Bernier, K. (in preparation). A portrait of states' financing of early intervention services: Survey results. Chapel Hill, NC: Carolina Policy Studies Program, Frank Porter Graham Child Development Center, University of North Carolina at Chapel Hill.

Clifford, R., Kates, D., Black, T., Eckland, J., & Bernier, K. (1991). Reconceptualization of financing under P. L. 99-457, Part H. Chapel Hill, NC: Carolina Policy Studies Program, Frank Porter Graham Child Development Center, University of North Carolina at Chapel Hill.

Gallagher, J., & Harbin, G. (1988). A scale to measure progress in the implementation of P.L. 99-457, Part H. Chapel Hill, NC: Carolina Policy Studies Program, Frank Porter Graham Child Development Center, University of North Carolina at Chapel Hill.

Harbin, G., Gallagher, J., & Lillie, T. (1989). States' progress related to fourteen components of P.L. 99-457, Part H. Chapel Hill, NC: Carolina Policy Studies Program, Frank Porter Graham Child Development Center, University of North Carolina at Chapel Hill.

Harbin, G., Gallagher, J., & Lillie, T. (1991). Types of policy approval to be used by states. Chapel Hill, NC: Carolina Policy Studies Program, Frank Porter Graham Child Development Center, University of North Carolina at Chapel Hill.

Harbin, G., Gallagher, J., Lillie, T., & Eckland, J. (1990). Status of states' progess in implementing Par H of P.L. 99-457: Report #2. Chapel Hill, NC: Carolina Policy Studies Program, Frank Porter Graham Child Development Center, University of North Carolina at Chapel Hill.

Harbin, G. & McNulty, B. (1990). Policy implementations: Perspectives on service coordination and interagency cooperation (pp. 700-721). In S. Meisels & J. Shonkoff (Eds.), Handbook of Early Childhood Intervention. New York: Cambridge University Press.

Meisels, S. J. (1985). A functional analysis of the evolution of public policy for handicapped young children. Educational Evolution and Policy Analysis, 7, 115-126.

Frank Porter Graham
Child Development Center
CB No. 8040, 300 NCNB Plaza
Chapel Hill, NC 27599